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10 *Attorneys for Defendants*

11  
12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION  
14

15 *In re: Hyundai and Kia Engine*  
16 *Litigation*

CASE NO. 8:17-cv-00838

Member Cases:  
8:17-cv-01365-JLS-JDE  
8:17-cv-02208-JLS-JDE  
2:18-cv-05255-JLS-JDE  
8:18-cv-00622-JLS-JDE

Related Case:  
8:18-cv-02223-JLS-JDE

**DECLARATION OF SHON  
MORGAN IN SUPPORT OF  
DEFENDANTS' UNOPPOSED  
NOTICE OF MOTION AND  
MOTION FOR COURT  
APPROVAL OF SETTLEMENT  
WITH OBJECTOR MEGHAN  
JONES**

1           1.     I am a member of the bar of the State of California and a partner with  
2 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for defendants Hyundai Motor  
3 America, Inc., Hyundai Motor Company, Kia Motors America, Inc., and Kia Motors  
4 Corporation. I make this declaration of personal, firsthand knowledge, and if called  
5 and sworn as a witness, I could and would testify competently thereto.

6           2.     I make this declaration in support of defendants' Notice of Motion and  
7 Motion for Court Approval of Settlement with Objector Meghan Jones.

8           3.     I have conferred on multiple occasions with Class Counsel about the  
9 relief sought by this motion and they do not oppose.

10          4.     **Exhibit A** to the motion is a true and correct copy of the settlement  
11 agreement with Ms. Jones, which includes the amount to be paid to Ms. Jones.

12          5.     It is my understanding that HMA and Ms. Jones negotiated a settlement  
13 amount based on her vehicle's Kelley Blue Book value assuming it was in excellent  
14 condition.

15          6.     I declare under penalty of perjury under the laws of the United States of  
16 America that the foregoing is true and correct.

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18  
19 DATED: November 23, 2020

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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21  
22 By /s/ Shon Morgan  
23 Shon Morgan  
24 *Attorneys for Kia Motors America, Inc.,*  
25 *Kia Motors Corporation, Hyundai Motor*  
26 *America, Inc., and Hyundai Motor*  
27 *Company, Ltd.*  
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